

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

V.

ROGER ANTHONY COOMBS,

Defendant.

INDICTMENT CR-10-176 PAM/JJK
(18 U.S.C. § 201(b)(2))

THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTION

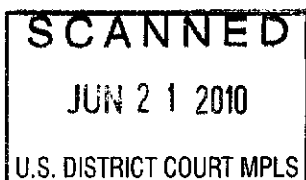
1. At all relevant times, Roger Anthony Coombs ("Coombs") was a public official, employed in the State of Minnesota as an Internal Revenue Service ("IRS") internal revenue agent.

2. At all relevant times, Coombs' official duties included conducting examinations of taxpayers' tax filings to determine whether the taxpayers had correctly reported and paid their tax liability to the IRS.

3. In early 2010, Taxpayer A received official correspondence from Coombs indicating that Taxpayer A had been selected for an examination.

4. Thereafter and on multiple occasions, Coombs met with Taxpayer A and Taxpayer B, an individual with whom Taxpayer A operated a small business. Initially, these meetings occurred either at the office of Taxpayer A's accountant or at Taxpayer A's and B's place of business.

5. At one meeting on May 6, 2010, Coombs told Taxpayers A



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RICHARD D. SLETTEN, CLERK
JUDGMENT ENTERED _____
DEPUTY CLERK'S INITIALS _____

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and B that his review of the records revealed a tax liability significantly higher than Taxpayer A had reported and paid to the IRS. During this meeting, and outside the presence of Taxpayer A's accountant, Coombs suggested that Taxpayers A and B meet with Coombs at a later time and without the accountant to discuss the issue.

6. Ultimately, Coombs suggested a meeting on Saturday, May 8, 2010. When Taxpayers A and B met with Coombs that day, Coombs told them that Taxpayer A owed the IRS approximately \$60,000.00, which was more than Coombs had previously indicated.

7. Coombs proposed a solution that he said would make the situation "go away." Specifically, Coombs asked Taxpayers A and B to pay him \$9,700.00. In return for paying Coombs this bribe, Coombs said he would arrange for the IRS to accept \$11,000.00 instead of the \$60,000.00 that Coombs said Taxpayer A owed the IRS. Taxpayers A and B agreed to Coombs' proposal.

8. Coombs and Taxpayer B met on May 19, 2010. During this meeting, Taxpayer B gave Coombs \$3,000.00 in cash, a partial payment of the \$9,700.00 bribe Coombs had requested. At this meeting, Coombs told Taxpayer B that Coombs had already "taken care" of things with the IRS. Coombs accepted the cash payment and did not turn the money over to the IRS.

9. Coombs and Taxpayer B met again on June 2, 2010. At this

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meeting, Taxpayer B gave Coombs \$6,700.00 in cash, the final payment toward the \$9,700.00 bribe Coombs had requested. Coombs accepted the cash payment.

COUNT 1

(Soliciting And Agreeing To Receive A Bribe
By A Public Official)

10. The grand jury re-alleges the allegations contained in paragraphs 1 through 9, of this Indictment.

11. On or about May 8, 2010, in the State and District of Minnesota, the defendant,

ROGER ANTHONY COOMBS,

a public official, directly and indirectly did corruptly demand, seek, and agree to receive and accept something of value personally, in return for being influenced in the performance of an official act; that is \$9,700 in connection with the conduct of his duties as an IRS internal revenue agent, all in violation of Title 18, United States Code, Section 201(b)(2).

COUNT 2

(Receiving A Bribe By A Public Official)

12. The grand jury re-alleges the allegations contained in paragraphs 1 through 9, of this Indictment.

13. On or about May 19, 2010, in the State and District of Minnesota, the defendant,

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a public official, directly and indirectly did corruptly receive and accept something of value personally, in return for being influenced in the performance of an official act; that is \$3,000 in connection with the conduct of his duties as an IRS internal revenue agent, all in violation of Title 18, United States Code, Section 201(b)(2).

COUNT 3

(Receiving A Bribe By A Public Official)

14. The grand jury re-alleges the allegations contained in paragraphs 1 through 9, of this Indictment.

15. On or about June 2, 2010, in the State and District of Minnesota, the defendant,

ROGER ANTHONY COOMBS,

a public official, directly and indirectly did corruptly receive and accept something of value personally, in return for being influenced in the performance of an official act; that is \$6,700 in connection with the conduct of his duties as an IRS internal revenue agent, all in violation of Title 18, United States Code, Section 201(b)(2).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON